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January 22, 2025

VIA ECF

Honorable Taryn A. Merkl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**RE: Kapoor v. Michael Matthews Jewelers of Kings Plaza, LLC, et. al.,
22 CV 5027 (HG)(TAM)**

Your Honor,

I write jointly with counsel for Defendants, Jesse David Eisenberg, Esq., pursuant to the Court's December 19, 2024, Order directing the parties to submit a status report and proposed schedule no later than January 22, 2025. In terms of discovery, counsel have met and conferred concerning the state of discovery and what items are outstanding. Both sides will work with their clients to pick up where discovery left off when prior defense counsel withdrew. In terms of settlement, the parties believe that the ability to resolve this case depends in part on how some aspects of the state court matters play out. The parties do not believe a settlement conference would be worthwhile at this time.

The parties have conferred and propose the following schedule:

- Fact Discovery Complete: May 30, 2025
- Status Letter as to Whether Parties Need Expert Discovery: June 27, 2025
- Deadline for Any Party to File a Pre-motion Letter if No Expert Discovery: July 11, 2025; and
- Deadline to Submit JPTO if no Pre-motion Letter is Filed: August 22, 2025.

Defendants' Counsel also reviewed the Client files, Court files, and spoke with Defendants' prior attorney to determine that Defendants' Counsel will not be representing Defendant Michael Matthews Jewelers of Kings Plaza, LLC as none of the individual Butt Defendants have any ownership interest in Defendant Michael Matthews Jewelers of Kings Plaza, LLC.

Respectfully submitted,

/s/

Joshua J. Lax, Esq.

CC: All counsel (By ECF)